

and deadlines in the present scheduling order and with regard to the United States' response to the Second Amended Complaint will allow the parties time to vet the potential resolutions.

A brief delay in discovery and the trial of this matter will not be burdensome or hinder the speedy disposition of justice. *See* Fed. R. Civ. P. 1. To date, nine depositions have been completed in this matter, and expert disclosures – as well as thousands of pages of documents – have been exchanged. This case was filed approximately a year ago, and a brief pause in the litigation will not cause undue delay or burden. To the contrary, if an amicable resolution can be reached, a stay will conserve party and judicial resources, and continuing to expend resources on expert depositions and other matters at this juncture may put an amicable resolution out of reach. Finally, Plaintiff has added numerous additional persons to this litigation and is in the process of serving those persons. A stay will allow orderly disposition of that process and prevent potential duplication of efforts once those parties join the litigation. In sum, the United States and Plaintiff submit that there is good cause to stay the pretrial litigation deadlines in this matter as more fully described below. *See Romar Sales Corp. v. Seddon*, 2013 WL 141133, at *2 (W.D. Mich. Jan 11, 2013); *Painter-Hart v. Sientra, Inc.*, No. 3:20-CV-418, 2021 WL 6327692, at *1 (E.D. Tenn. Mar. 19, 2021).

Specifically, the United States and the Plaintiff move to stay:

1. All dates and deadlines contained in the Scheduling Order (Doc. 21), including the trial date; and

2. The United States' deadline for answering the Second Amended Complaint (*see* Doc. 64).

The parties move to stay these deadlines through the conclusion of January 31, 2025, and will submit a motion to lift stay – containing suggested revised dates and deadlines for the Court's consideration – or a motion to continue stay – stating specific good cause for continuing the stay


– by the close of business (5:00pm ET) on January 31, 2025. As it relates to the new defendants, the United States and Plaintiff do not seek to extend the time for serving the new defendants pursuant to Rule 4 of the Federal Rules of Civil Procedure, nor do the United States and Plaintiff seek to extend the new parties’ period for responding to the Second Amended Complaint.

Respectfully Submitted

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